

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

NO.: 3:22-CR-23

vs.

(Judge MARIANI)

JAMES RODRIGUEZ, JR.

Defendant

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**MOTION TO WITHDRAW DOCUMENT 86**  
**(Motion to Suppress Evidence)**

The Defendant, JAMES RODRIGUEZ, JR., by and through his counsel, William J. Watt, III, Esquire, hereby moves the Court to withdraw Document 86 on the docket and in support thereof submits the following:

1. On May 23, 2024, counsel for the Defendant filed a pretrial Motion to Suppress Evidence (Doc. 86).
2. An evidentiary hearing on the Defendant's Motion to Suppress Evidence is scheduled for November 8, 2024.
3. The Defendant is desirous of withdrawing the above-referenced Motion to Suppress Evidence based on the advice of counsel.
4. The aforementioned Motion to Suppress Evidence was filed in good faith based on facts and circumstances that the undersigned counsel recently determined to be inaccurate.

5. Counsel spoke to the Defendant on November 5, 2024 and the Defendant agreed that the Motion to Suppress Evidence lacked merit and should be withdrawn.

6. Assistant United States Attorney Jenny Roberts concurs with this Motion.

7. The Defendant does not give up or waive his right to challenge the subject evidence at trial.

WHEREFORE, the Defendant respectfully requests that this Honorable Court enter an order withdrawing Defendant's Motion to Suppress Evidence (Doc. 86).

RESPECTFULLY SUBMITTED,

  
William J. Watt, III, Esquire  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

vs.

JOHAN M. LARA-MEJIA

Defendant

NO.: 3:18-CR-18

(Judge MARIANI)

**CERTIFICATE OF SERVICE**

I, William J. Watt, III, Esquire do hereby certify that I served the foregoing Motion to Suppress Evidence and Brief in Support via ECF:

Jenny Roberts, Esquire  
Assistant United States Attorney

Date: November 5, 2024

  
William J. Watt, III, Esquire  
Attorney for Defendant